

MEMO ENDORSEL

U.S. Department of Justice



United States Attorney
Southern District of New York

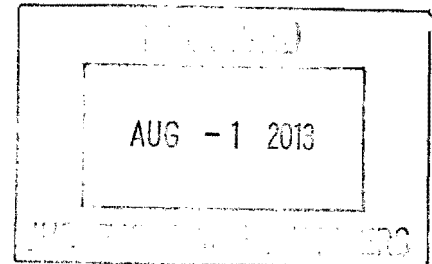
The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: August 5, 2013

August 1, 2013

BY EM

The Honorable John F. Keenan
United States District Judge
Southern District of New York
500 Pearl Street, Suite 1930
New York, New York 10007



Re: *United States of America v. Minaya et. al*,
S4 11 Cr. 755 (JFK)

Dear Judge Keenan:

The Government respectfully submits this letter in advance of the trial scheduled for September 23, 2013 in the above-captioned matter. In light of the number of defendants that have not entered a plea of guilty, the Government respectfully requests that the Court set a second trial date and adopt the proposed trial grouping. The Government has been engaged in plea discussions with all the defendants since the inception of the case and after the Court set the trial date. The Government anticipates that a number of defendants may still enter a guilty plea but does not anticipate that these dispositions will result in a suitable number of defendants to accommodate into one trial.

The Government's proposed grouping of trial defendants is based on common offenses committed by the grouped defendants and the similar evidence that would be introduced at trial. In addition, the Government has taken note of the Court's concern regarding the length of pre-trial detention and has proposed the individuals who have been detained longer in the first group, which would be tried beginning on the already scheduled September 23, 2013 trial date. The Government continues to anticipate that the trial will take approximately four weeks and would be available anytime after November 4, 2013 to try the second group of defendants.

Group A (September 23, 2013 Trial)	Group B (Trial date to be set)
Oscar Minaya Jose Ortega Henry Michel Angelo Michel Jovanny Rodriguez Jesus Hilario-Bello Katia Gatón Richard Trejo	Romaldo Espinal Jason Veras Alejandro Bello Richard Perez Feliz Robinson

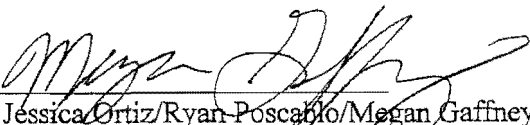
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Should the Court request more information or wish to have a conference, the Government is available at the Court's convenience.

Respectfully submitted,

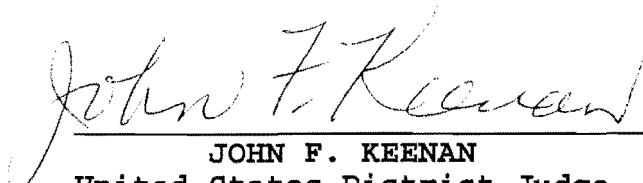
PREET BHARARA
United States Attorney
Southern District of New York

By:


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Assistant United States Attorneys
(212) 637-2200

cc: Counsel of Record (via email)

The Court will hold a conference as to the
Defendants in Groups "A" and "B" on August
14, 2013 at 10:30 a.m.
SO ORDERED.
Dated: August 5, 2013


JOHN F. KEENAN
United States District Judge